

9/30/08-02157

MEMORANDUM

CH2MHILL

Response to VDEQ Comments on the Draft Five-Year Review Report for Sites 1, 2, 3, 6, 20, and 23 at Naval Station Norfolk

TO: Mr. Eric Salopek/VDEQ
COPIES: Mr. Steve Hirsh/USEPA
Ms. Winoma Johnson/MIDLANT
FROM: Holly Rosnick/CH2M HILL
DATE: September 30, 2008

Below is the response to the Virginia Department of Environmental Quality (VDEQ) on the *Draft Five-Year Review for Sites 1, 2, 3, 6, 20, and 23: Naval Station Norfolk, Norfolk, Virginia*. The responses to the comments will be incorporated in the final report.

Comments

1. Five-Year Review Summary Form: 5. Site 20, Building LP-20 Site: B. Recommendations and Follow-up Actions: This section stated "The potential for vapor intrusion should be performed based on volatile organic compounds...within the groundwater." The VDEQ has concerns with the utilization of this approach as a surrogate for conducting indoor air and sub-slab monitoring at the Building LP-20 site. While our office recognizes that the concrete cover system has been implemented at Building LP-20, additional data may need to be collected to address VOC indoor air concerns.

Response: The Navy has provided that some air monitoring data has been collected during the pilot study from manholes and additionally air monitoring is conducted as part of the AS/SVE operations from 16 locations in the vicinity of the system. Based on that data, the Navy believes vapor intrusion is not a concern. However, the Navy understands that there is limited air monitoring information available for Site 20 and acknowledges that additional indoor air assessment may be warranted prior to the next Five Year Review.

2. Page 4-9: Section 4.8. Site 1 Recommendations and Follow-up Actions: This section stated "...utility trenching activities were observed in Area A...Additionally...excavation for a drainage ditch in Area A was observed. Both of these activities resulted in a breach of the landfill cover." As stated, the Navy has revised an *internal review process* to address land use controls. Will the result of the referenced Navy process translate into additional signage along perimeter security fences/structures in Area A?

Response: The Navy has coordinated with VDEQ and USEPA on the LUC

implementation activities following the breaches as reflected in the a letter dated April 29, 2005 from the Navy to Mr. Robert Weld, VDEQ. As indicated in this letter, the process change includes a review of all excavation activities that occur at or near an Installation Restoration site. The RPM informs the requestor of any restrictions at the site to ensure the land use controls are maintained. The change in Navy process will not translate into additional signage.

3. Page 8-6: Section 8.6. Site 20 Technical Assessment: Changes in Risk Assessment Methodologies: This section stated "As part of the AS/SVE pilot study, air monitoring was completed at 22 perimeter utility manholes and inside Building LP-26 to assess the degree of vertical and horizontal migration of the sparged contaminants...into manhole structures." Has any air monitoring activities (indoor air, manhole or sub-slab) been conducted in the area since the AS/SVE pilot test?

Response: Air monitoring is conducted weekly as part of the AS/SVE operations from 16 locations in the vicinity of the system.

4. The VDEQ concurs with the conclusions in the Protectiveness Statements for Site 1, Site 2, Site 3, Site 6, Site 20, Site 22 and Site 23, and that the remedies are functioning to protect current human health and the environment and are expected to remain protective in the future.

Response: No response required.